

IN RE: Application of Kiawah Island Utility, Inc  
for Adjustment of Rates and Charges and  
Modification to Certain Terms and Conditions  
for the Provisions of Water and Sewer Service

## COVER SHEET

DOCKET  
NUMBER: 2018 - 257 - WS

(Please type or print)

Submitted by: Dwayne M. Green

SC Bar Number: 9559

Address: P.O. Box 2009 20009

Telephone: 843-262-2626

Charleston, SC 29413

Fax: 843-768-4764

Other:

Email: dwayne@greenlawsc.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☐ Other:

## INDUSTRY (Check one)

- ☐ Electric
- ☐ Electric/Gas
- ☐ Electric/Telecommunications
- ☐ Electric/Water
- ☐ Electric/Water/Telecom.
- ☐ Electric/Water/Sewer
- ☐ Gas
- ☐ Railroad
- ☐ Sewer
- ☐ Telecommunications
- ☐ Transportation
- ☐ Water
- ☒ Water/Sewer
- ☐ Administrative Matter
- ☐ Other: \_\_\_\_\_

## NATURE OF ACTION (Check all that apply)

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Affidavit                 | <input type="checkbox"/> Letter                            | <input type="checkbox"/> Request                   |
| <input type="checkbox"/> Agreement                 | <input type="checkbox"/> Memorandum                        | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Answer                    | <input type="checkbox"/> Motion                            | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Appellate Review          | <input type="checkbox"/> Objection                         | <input type="checkbox"/> Resale Agreement          |
| <input type="checkbox"/> Application               | <input type="checkbox"/> Petition                          | <input type="checkbox"/> Resale Amendment          |
| <input type="checkbox"/> Brief                     | <input type="checkbox"/> Petition for Reconsideration      | <input type="checkbox"/> Reservation Letter        |
| <input type="checkbox"/> Certificate               | <input type="checkbox"/> Petition for Rulemaking           | <input type="checkbox"/> Response                  |
| <input type="checkbox"/> Comments                  | <input type="checkbox"/> Petition for Rule to Show Cause   | <input type="checkbox"/> Response to Discovery     |
| <input type="checkbox"/> Complaint                 | <input checked="" type="checkbox"/> Petition to Intervene  | <input type="checkbox"/> Return to Petition        |
| <input type="checkbox"/> Consent Order             | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation               |
| <input type="checkbox"/> Discovery                 | <input type="checkbox"/> Prefiled Testimony                | <input type="checkbox"/> Subpoena                  |
| <input type="checkbox"/> Exhibit                   | <input type="checkbox"/> Promotion                         | <input type="checkbox"/> Tariff                    |
| <input type="checkbox"/> Expedited Consideration   | <input type="checkbox"/> Proposed Order                    | <input type="checkbox"/> Other: _____              |
| <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest                           |  |
| <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit             |  |
| <input type="checkbox"/> Late-Filed Exhibit        | <input type="checkbox"/> Report                            |  |

Print Form

Reset Form

RECEIVED

DEC 27 2018

FSC SC  
MAIL / DMS

**GREEN LAW OFFICES**  
ATTORNEYS AT LAW

602 Rutledge Avenue  
Charleston, SC • 29403 or  
P.O. Box 20009  
Charleston, SC • 29413  
tel: 843-266-2626  
fax: 843-266-2627

Dwayne M. Green  
ATTORNEY at LAW  
dwayne@greenlawsc.com

December 24, 2018

**VIA U.S MAIL**

Jocelyn Boyd  
Clerk/ Administrator  
Public Service Commission of SC  
101 Executive Center Drive Suite 100  
Columbia, SC 29201

Dear Ms. Boyd:

Please find enclosed for filing an original and two copies of the Town of Kiawah Island's Petition to Intervene in the above-referenced action. After filing the original and copies, please return a stamped filed copy to me in the envelope enclosed.

With kind regards, I remain,

Yours very truly,



Dwayne M. Green

Enclosures: as stated  
CC: Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201  
Stephanie Monroe Tillerson (via email)

DEC 27 2018  
REG. STAFF  
1401/900

STATE OF SOUTH CAROLINA  
PUBLIC SERVICE COMMISSION  
COLUMBIA

DOCKET NO.: 2018-257-WS

In the Matter of:

Application of Kiawah Island Utility, Inc. for	)	
Adjustment of Rates and Charges and Petition	)	to Intervene By
to Modifications to Certain Terms and The	)	The Town of Kiawah Island
Conditions for the Provision of Water and	)	
Sewer Service	)	

TOWN OF KIAWAH ISLAND'S PETITION TO INTERVENE

The Town of Kiawah Island, on behalf of its citizens who are customers of Kiawah Island Utility, Inc., users of water and sewer service and potential users of water and sewer service in the Town of Kiawah Island, respectfully petitions the Commission pursuant to R. 103-825 of the Commissions' Rules and Regulations to intervene and be made a party of record in the above-referenced proceeding.

In support hereof the Town respectfully states as follows:

1. Kiawah Island Utility, Inc. has filed an Application with the Commission requesting a new schedule of rates and charges for water and sewer service for its customers in the Town of Kiawah Island.

2. The Town of Kiawah Island is home to approximately 1,467 permanent residents and numerous temporary residents each year. Citizens of the Town and businesses operating are customers of Kiawah Island Utility, Inc., users of water and sewer service or potential users of water in the Town, whose interests will be affected by the resolution of issues in this proceeding.

3. The Town has an interest in participating in this proceeding to urge the establishment of fair, just and reasonable methodologies of setting rates for water and sewer. The Application as currently

drafted would impact each citizen of the Town and each visitor to the Town, and accordingly, the Town has an interest in this proceeding.

4. The Town opposes the Application for a new schedule of rates and charges for water and sewer.

5. The Town requests the opportunity to receive copies of the pleadings of other participants, receive copies of discovery requests and responses filed by the other participants, and, if appropriate, to submit reply comments and testimony, and briefs, as well as to cross-examine witnesses at any hearing(s) scheduled in this matter.

6. The Town is represented in this matter by Dwayne M. Green, Esquire, and accordingly, the Town requests that copies of all communications and correspondence concerning the Petition to Intervene and other matters related to this matter should be directed to:

Dwayne Green, Esquire  
Law Offices of Dwayne Green  
P.O. Box 20009  
Charleston, SC 29413  
(843) 266-2626

WHEREFORE, the Town of Kiawah Island, on behalf of its citizens who will be affected by the resolution of issues in this proceeding, respectfully requests that the Commission:

- A. Grant its Petition to Intervene:
- B. Grant such other and further relief as this Commission deems necessary and just.

BY:

  
Dwayne M. Green

Dated: 12/24/2018  
Charleston, South Carolina

CERTIFICATE OF SERVICE

I certify that a copy of the Petition to Intervene by the Town of Kiawah Island in Docket No. 2018-257-WS has been served by depositing a copy in the United States mail, postage prepaid, addressed to the parties of record.

This December day of 24<sup>th</sup>, 2018.



Stephanie Monroe Tillerson, Town Administrator

SERVICE LIST

Joselyn Boyd  
Clerk/Administrator  
Public Service Commission of SC  
101 Executive Center Drive Suite 100  
Columbia, SC 29201

Office of Regulatory Staff  
1401 Main street, Suite 900  
Columbia, SC 29201